



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

---

*Frank O'Bannon*  
Governor

*Lori F. Kaplan*  
Commissioner

100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.IN.gov/idem](http://www.IN.gov/idem)

March 10, 2003

Brian Saunders  
Raybestos Products Company  
1204 Darlington Avenue  
Crawfordsville, IN 47933

Re: 107-16919-00007  
Third Significant Permit Modification to:  
Part 70 permit No.: T107-6836-00007

Dear Mr. Saunders:

Raybestos Products Company was issued Part 70 operating permit T107-6836-00007 on April 14, 1999 for operation of a stationary automotive parts manufacturing plant. A letter requesting changes to this permit was received on December 10, 2002. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter please contact Alic Bent, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (973) 575-2555, ext. 3206 or dial (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
AB/EVP

cc: File - Montgomery County  
Air Compliance Section Inspector - Eric Courtright  
Compliance Data Section - Karen Nowak  
Technical Support and Modeling - Michele Boner  
Administrative and Development

# PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Raybestos Products Company  
1204 Darlington Avenue  
Crawfordsville, Indiana 47933**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T107-6836-00007	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: April 14, 1999
First Administrative Amendment 107-11435-00007	Issuance Date: July 28, 1999
First Significant Permit Modification 107-12810-00007	Issuance Date: January 23, 2000
First Significant Source Modification 107-14594-00007	Issuance Date: November 19, 2001
Second Significant Permit Modification 107-14857-00007	Issuance Date: December 4, 2001
First Reopening No.: R 107-13431-00007	Issuance Date: February 7, 2002
Second Administrative Amendment 107-16817-00007	Issuance Date: January 7, 2003
Third Significant Permit Modification 107-16919-00007	Pages Revised: 1, 9, 50, 51, 52, 53, 55 and 59a
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 10, 2003

- (X) One (1) day tank T-17, identified as wash out bed 1, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16171).
- (14) One (1) paper blanking operation, installed in 1989, identified as P018, with a maximum capacity of 420 pounds of stamped paper per hour and 1,052 pounds of paper scrap per hour, using baghouse(s) as control, consisting of the following equipment:
  - (A) One (1) blank press;
  - (B) Other miscellaneous equipment;
  - (C) Eight (8) blank presses;
  - (D) Two (2) feeders;
  - (E) Scales;
  - (F) One (1) air press;
  - (G) One (1) baler; and
  - (H) Other miscellaneous equipment.
- (15) One (1) rubber making operation, installed in 1979, identified as P019, with a maximum capacity of 200 pounds of rubber friction material per hour, using baghouse(s) as control, consisting of the following equipment:
  - (A) One (1) banbury mixer.
- (16) One (1) yarn saturation operation, constructed in 2003, identified as P013(O), with a maximum capacity of 750 wound wafer pieces per day, consisting of the following equipment:
  - (A) One (1) electric curing oven.
- (17) One (1) wafer forming operation, constructed in 2003, identified as P013(P), with a maximum capacity of 750 wound wafer pieces per day consisting of the following equipment:
  - (A) One (1) electric heater.
- (18) One (1) 25.5 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed in 1952, identified as P020A, exhausting to one (1) stack (17500).
- (19) One (1) 15 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed in 1988, identified as P020B, exhausting to one (1) stack (14165).

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (11) One (1) paper saturation operation, identified as P013, with a maximum capacity of 40,400 paper friction products per hour, following equipment:
  - (A) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16101);
  - (B) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16102);
  - (C) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16103);
  - (D) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16104);
  - (E) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16105);
  - (F) One (1) monorail cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16125);
  - (G) One (1) saturator dry out oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16114);
  - (H) One (1) saturator dry out oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16124);
  - (I) One (1) saturator oven, installed in 1993, using a thermal oxidizer as control, exhausting to one (1) stack (13058);
  - (J) One (1) oven drier, installed in 1984, exhausting to one (1) stack (20101);
  - (K) One (1) saturator, installed in 1984, exhausting to one (1) stack (20105);
  - (L) One (1) chinawood oil exhaust fan, installed in 1988, exhausting to one (1) stack (14124);
  - (M) One (1) chinawood oil exhaust fan, installed in 1988, exhausting to one (1) stack (14125); and
  - (N) One (1) resin saturation line, equipped with two (2) 1.6 million British thermal units per hour natural gas fired burners, using a 9.5 million British thermal units per hour natural gas fired thermal oxidizer as control.
- (16) One (1) yarn saturation operation, constructed in 2003, identified as P013(O), with a maximum capacity of 750 wound wafer pieces per day, consisting of the following equipment:
  - (A) One (1) electric curing oven.
- (17) One (1) wafer forming operation, constructed in 2003, identified as P013(P), with a maximum capacity of 750 wound wafer pieces per day consisting of the following equipment:
  - (A) One (1) electric heater.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements) and Construction Permit (CP1073006-00007), issued on November 23, 1993, the one (1) saturator oven (identified as (I) above) shall remain totally enclosed at all times it is in operation. The operating temperature of the thermal oxidizer shall be maintained at minimum operating temperature of 1,400 o F, or a temperature determined in the latest stack test that assures ninety-five percent (95%) destruction of the captured volatile organic compound (VOC). This will satisfy the requirements of Best Available Control Technology (BACT)

**D.4.2 Volatile Organic Compound (VOC) [326 IAC 8-2-5]**

---

- (a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the owner or operator of a facility engaged in the surface coating of paper may not cause, allow, or permit the discharge into the atmosphere of any volatile organic compound in excess of two and nine-tenths (2.9) pounds of VOC per gallon of coating excluding water delivered to the coating applicator.
- (b) When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-5, 2.9 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum 97.5% capture efficiency and 97.5% destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by 326 IAC 8-1-2(a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 95%, the VOC content of the coating shall not exceed 95 pounds per gallon of coating solids delivered to the applicator.

**D.4.3 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-11]**

---

VOC usage for the yarn saturation operation shall be limited to less than 15.0 lbs of VOC per day. Therefore, the requirements of 326 IAC 8-2-11 do not apply.

**D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

---

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Compliance Determination Requirements**

**D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

---

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing utilizing Method 25, 40 CFR 60, Appendix A, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. The Office of Air Management has determined that one oxidizer of a multiple unit may be used as a representative of the other oxidizers. Subsequently, one oxidizer of the multiple unit will be tested according to the test schedule, until all oxidizers are tested. However, if the representative oxidizer does not show compliance with the limits or, after calculations to convert the results from the representative oxidizer to the other oxidizers, the other oxidizers are not in compliance, then a re-test of all oxidizers shall be performed to show compliance with the permit requirements. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

**D.4.6 Volatile Organic Compounds (VOC)**

---

Compliance with the VOC content and usage limitations contained in Condition D.4.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.4.7 Volatile Organic Compound (VOC)**

---

To demonstrate compliance with Condition D.4.2, the thermal oxidizers for VOC control shall be in operation at all times when the one (1) paper saturation operation is in operation. The operating temperature of the thermal oxidizer shall be maintained at a minimum operating temperature of 1,400 ° F, or a temperature determined in the latest stack test that assures ninety-five percent (95%) overall control (including capture and destruction) efficiency of volatile organic compound (VOC) emissions.

## Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

### D.4.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1 and D.4.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.1 and D.4.2.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
- (2) A log of the usage each month
- (3) The volume weighted VOC content of the coatings used for each month for each day that any coating with VOC content greater than 2.9 pounds per gallon is used. If at any time a coating with VOC content greater than 2.9 pounds per gallon less water is used, compliance with this rule shall be shown by the use of the following equation to calculate daily volume weighted average:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [Dc * O * Q / [1 - W * Dc / Dw]]}{3 C}$$

Dc = density of coating, lb/gal

O = weight percent organics, %

W = percent volume water, %

Dw = density of water, lb/gal

Q = quantity of coating, gal/unit

C = total of coatings used, gal/unit;

- (4) The solvent usage for each month;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.4.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.3.
- (1) The amount of coating material and solvent used less water on daily basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (2) The cleanup solvent usage for each day;
  - (3) The total VOC usage for each day; and
  - (4) The weight of VOCs emitted for each compliance period.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.4.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.3 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.5

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (18) One (1) 25.5 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed in 1952, identified as P020A, exhausting to one (1) stack (17500).

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.5.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to this 326 IAC 6-2-3(a), the particulate matter (PM) emissions from the 25.5 million British thermal unit per hour (mmBtu/hr) boiler (P020A) constructed in 1952, shall not exceed 0.8 pounds per million Btu. This limitation is used because the calculated limitation was greater than 0.80 pounds per million Btu.

The calculated limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where:

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 mmBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 mmBtu/hr heat input.

h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times p_{a_i} \times Q}{\sum_{i=1}^N p_{a_i} \times Q}$$



## SECTION D.6

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (19) One (1) 15 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed in 1988, identified as P020B, exhausting to one (1) stack (14165).  
Insignificant Activity: One (1) 60 hp natural gas fired boiler, installed in 1984.

## Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.6.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emissions for Sources of Indirect Heating), the one (1) 15 million British thermal unit per hour (mmBtu/hr) boiler (P020B) constructed in 1988, and the one (1) 60 hp boiler shall be limited to 0.40 pounds per million British thermal unit (lb/mmBtu)

This limitation is based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

## Compliance Determination Requirements

### D.6.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Section C Performance Testing.

## Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

### D.6.3 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 would require this facility to have monitoring requirements.

## Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

### D.6.4 Natural Gas Fired Boiler Certification

An annual certification for the one (1) 15 million British thermal unit per hour (mmBtu/hr) boiler shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than July 1 of each year.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

### Part 70 Usage Report

(Submit Report Quarterly)

Source Name: Raybestos Products Company  
Source Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933  
Mailing Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933  
Part 70 Permit No.: T107-6836-00007  
Facility: Yarn Saturation Operation (P013(O))  
Parameter: VOC  
Limit: Actual VOC emissions of less than 15 lbs/day.  
Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day	VOC Emission (lbs/day)	Day	VOC Emission (lbs/day)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Minor Source Modification and a Significant Permit Modification to a Part 70 Operating Permit**

#### **Source Background and Description**

<b>Source Name:</b>	Raybestos Products Company
<b>Source Location:</b>	1204 Darlington Avenue, Crawfordsville, IN 47933
<b>County:</b>	Montgomery
<b>SIC Code:</b>	3799
<b>Operation Permit No.:</b>	T107-6836-00007
<b>Operation Permit Issuance Date:</b>	April 14, 1999
<b>Source Modification No.:</b>	MSM107-16568-00007
<b>Permit Modification No.:</b>	SPM107-16919-00007
<b>Permit Reviewer:</b>	Alic Bent/EVP

The Office of Air Quality (OAQ) has reviewed a modification application from Raybestos Products Company relating to the operation of stationary automotive parts manufacturing operation.

#### **History**

On December 10, 2002, Raybestos Products Company submitted an application to the OAQ requesting to add a yarn saturation operation and a wafer forming operation to their existing plant. Raybestos Products Company was issued a Part 70 permit T107-6836-00007 on April 14, 1999.

#### **New Emission Units and Pollution Control Equipment Receiving Prior Approval**

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-7-5(16):

- (a) One (1) yarn saturation operation, to be constructed in 2003, identified as P013(O), with a maximum capacity of 750 wound wafer pieces per day, consisting of the following equipment:
  - (1) One (1) electric curing oven.
- (b) One (1) wafer forming operation, to be constructed in 2003, identified as P013(P), with a maximum capacity of 750 wound wafer pieces per day consisting of the following equipment:
  - (1) One (1) electric heater.

#### **Existing Approvals**

The source was issued a Part 70 Operating Permit T107-6836-00007 on April 14, 1999. The source has since received the following:

- (a) First Administrative Amendment No.: 107-11435-00007, issued on December 7, 1999;

- (b) First Significant Permit Modification No.: 107-12810-00007, issued on January 23, 2001;
- (c) First Significant Source Modification No.: 107-14594-00007, issued on November 19, 2001;
- (d) Second Significant Permit Modification No.: 107-14857-00007, issued on December 4, 2001;
- (e) First Reopening No.: 107-13431-00007, issued on February 7, 2002; and
- (f) Second Administrative Amendment No.: 107-16817-00007, issued January 7, 2003.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
SAT-14	Yarn Saturation Process	30	0.67	1000	250
GV-1	Wafer Forming Process	30	NA	NA	70

### Recommendation

The staff recommends to the Commissioner that the Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 10, 2002.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations pages 1 through 2.

### Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	-
PM-10	-
SO <sub>2</sub>	-
VOC	10.67
CO	-
NO <sub>x</sub>	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Formaldehyde	0.10
MEK	7.80
Phenol	0.75
TOTAL	8.65

### Justification for the Modification

The Title V permit is being modified through a Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4)(B)(iii), this is a minor source modification for which the potential to emit of VOC is less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year. The Minor Source Modification will be incorporated into the permit through a Significant Permit Modification because a new limit and conditions for record keeping and reporting are required to be added to the existing title V permit.

### County Attainment Status

The source is located in Montgomery County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Montgomery County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC	greater than 250
CO	less than 100
NOx	less than 100

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

- (b) These emissions are based upon the source's actual emissions data for 2000.

### Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single HAP	Total HAPs
P013(O)	-	-	-	< 2.74 <sup>(1)</sup>	-	-	7.80	8.65
P013(P)	-	-	-	2.50	-	-	-	-
Total Emissions	-	-	-	< 5.24	-	-	< 10	< 25

(1) VOC emissions are limited to less than 15 lb/day to render 326 IAC 8-2-11 not applicable.

This modification to an existing major stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

### Federal Rule Applicability

- (a) This modification does not involve a pollutant-specific emissions unit:
- (1) with the potential to emit before controls equal to or greater than one hundred (100) tons per year, and
  - (2) that is subject to an emission limit and has a control device that is necessary to meet that limit.
- Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.
- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable for the modification to this source.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61) applicable for the modification to this source.

### State Rule Applicability - Individual Facilities

#### 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration (PSD))

This modification to a PSD major source is not subject to this rule. This rule applies to modifications with the potential to emit (PTE) greater than or equal to 40 tons of VOC per year. This modification has a PTE VOC of 10.7 tons per year. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

#### 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The yarn saturation operation and the wafer forming operation will each emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

### 326 IAC 8-2-11 (Fabric Coating)

The yarn saturation operation (P013(O)) shall limit actual VOC usage to less than 15.0 lbs per day. Therefore, pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2-11 do not apply .

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to the modification to this source.

## Proposed Changes to the Part 70 Operating Permit

The following changes are made as the First Minor Source Modification 107-16568-00007 to Part 70 Operating Permit No. T107-6836-00007 (new language shown in bold and deleted language shown with a line through it):

- (1) The following changes have been made to Section A.1.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary automotive parts manufacturing operation.

Responsible Official:	<del>Jan Morse</del> <b>Assembly Plant Manager</b>
Source Address:	1204 Darlington Avenue, Crawfordsville, Indiana 47933
Mailing Address:	1204 Darlington Avenue, Crawfordsville, Indiana 47933
<b>General Source</b> Phone Number:	765-362-3500
SIC Code:	2621, 3069, 3499, 3295, 3479, 3471, 2891
County Location:	Montgomery
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

(2) The following changes have been made to Section A.2.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

---

- (15) One (1) rubber making operation, installed in 1979, identified as P019, with a maximum capacity of 200 pounds of rubber friction material per hour, using baghouse(s) as control, consisting of the following equipment:
  - (A) One (1) banbury mixer.
- (16) **One (1) yarn saturation operation, constructed in 2003, identified as P013(O), with a maximum capacity of 750 wound wafer pieces per day, consisting of the following equipment:**
  - (A) **One (1) electric curing oven.**
- (17) **One (1) wafer forming operation, constructed in 2003, identified as P013(P), with a maximum capacity of 750 wound wafer pieces per day consisting of the following equipment:**
  - (A) **One (1) electric heater.**
- (168) One (1) 25.5 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed in 1952, identified as P020A, exhausting to one (1) stack (17500).
- (179) One (1) 15 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed in 1988, identified as P020B, exhausting to one (1) stack (14165).



- (3) The following revisions have been made to the facility description box in Section D.4.

Facility Description [326 IAC 2-7-5(15)]

- (11) One (1) paper saturation operation, identified as P013, with a maximum capacity of 40,400 paper friction products per hour, consisting of the following equipment:
- (A) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16101);
  - (B) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16102);
  - (C) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16103);
  - (D) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16104);
  - (E) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16105);
  - (F) One (1) monorail cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16125);
  - (G) One (1) saturator dry out oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16114);
  - (H) One (1) saturator dry out oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16124);
  - (I) One (1) saturator oven, installed in 1993, using a thermal oxidizer as control, exhausting to one (1) stack (13058);
  - (J) One (1) oven drier, installed in 1984, exhausting to one (1) stack (20101);
  - (K) One (1) saturator, installed in 1984, exhausting to one (1) stack (20105);
  - (L) One (1) chinawood oil exhaust fan, installed in 1988, exhausting to one (1) stack (14124);
  - (M) One (1) chinawood oil exhaust fan, installed in 1988, exhausting to one (1) stack (14125); and
  - (N) One (1) resin saturation line, equipped with two (2) 1.6 million British thermal units per hour natural gas fired burners, using a 9.5 million British thermal units per hour natural gas fired thermal oxidizer as control.
- (16) **One (1) yarn saturation operation, constructed in 2003, identified as P013(O), with a maximum capacity of 750 wound wafer pieces per day, consisting of the following equipment:**
- (A) **One (1) electric curing oven.**
- (17) **One (1) wafer forming operation, constructed in 2003, identified as P013(P), with a maximum capacity of 750 wound wafer pieces per day consisting of the following equipment:**
- (A) **One (1) electric heater.**

- (4) A new Condition D.4.3 has been added to the permit to include the VOC usage limit for the yarn saturation operation. The rest of the conditions have been re-numbered accordingly.

**D.4.3 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-11]**

**VOC usage for the yarn saturation operation shall be limited to less than 15.0 lbs of VOC per day. Therefore, the requirements of 326 IAC 8-2-11 do not apply.**

- (5) The following revisions have been made to Condition D.4.7 (now re-numbered D.4.8).

**D.4.78 Record Keeping Requirements**

- (b) To document compliance with Condition D.4.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.3.
- (1) The amount of coating material and solvent used less water on daily basis.
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (2) The cleanup solvent usage for each day;
- (3) The total VOC usage for each day; and
- (4) The weight of VOCs emitted for each compliance period.
- (bc) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

- (6) A new Condition D.4.9 has been added to the permit.

**D.4.9 Reporting Requirements**

A quarterly summary of the information to document compliance with Condition D.4.3 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (7) The following revisions have been made to the facility description box in Section D.5.

Facility Description [326 IAC 2-7-5(15)]

- (168) One (1) 25.5 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed in 1952, identified as P020A, exhausting to one (1) stack (17500).

- (8) The following revisions have been made to the facility description box in Section D.6.

Facility Description [326 IAC 2-7-5(15)]

- (179) One (1) 15 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed in 1988, identified as P020B, exhausting to one (1) stack (14165).  
Insignificant Activity: One (1) 60 hp natural gas fired boiler, installed in 1984.

- (9) A new reporting form has been added to the permit for the yarn saturation operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Usage Report**

(Submit Report Quarterly)

**Source Name:** Raybestos Products Company  
**Source Address:** 1204 Darlington Avenue, Crawfordsville, Indiana 47933  
**Mailing Address:** 1204 Darlington Avenue, Crawfordsville, Indiana 47933  
**Part 70 Permit No.:** T107-6836-00007  
**Facility:** Yarn Saturation Operation (P013(O))  
**Parameter:** VOC  
**Limit:** Actual VOC emissions of less than 15 lbs/day.  
**Month:** \_\_\_\_\_ **Year:** \_\_\_\_\_

Day	VOC Emission (lbs/day)	Day	VOC Emission (lbs/day)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.  
Deviation has been reported on: \_\_\_\_\_

**Submitted by:** \_\_\_\_\_  
**Title/Position:** \_\_\_\_\_  
**Signature:** \_\_\_\_\_  
**Date:** \_\_\_\_\_  
**Phone:** \_\_\_\_\_

Attach a signed certification to complete this report.

## **Conclusion**

This source modification shall be subject to the conditions of the attached Part 70 Minor Source Modification No. 107-16568-00007 and Significant Permit Modification No. 107-16919-00007.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

Page 1 of 2 TSD App A

**Company Name: Raybestos Products Company  
Address City IN Zip: 1204 Darlington Avenue, Crawfordsville, IN 47933  
MSM: 107-16568-00007  
SPM: 107-16919-00007  
Permit Reviewer: Alic Bent/EVP  
Date: January 8, 2003**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
P013(O)																
Yarn Saturant (as applied)	7.6	67.07%	0.0%	67.1%	0.0%	75.38%	0.01000	31.250	5.10	5.10	1.59	38.21	6.97	0.00	6.76	100%
MEK Viscosity Reducer	6.7	100.00%	0.0%	100.0%	0.0%	0.00%	0.00130	31.250	6.70	6.70	0.27	6.53	1.19	0.00	NA	100%
P013(P)																
Mold Release Lubricant	6.5	70.00%	0.0%	70.0%	0.0%	0.00%	0.00400	31.250	4.57	4.57	0.57	13.70	2.50	0.00	NA	100%

<b>Potential Emissions</b>	<b>Add worst case coating to all solvents</b>	<b>2.44</b>	<b>58.44</b>	<b>10.67</b>	<b>0.00</b>
----------------------------	---	-------------	--------------	--------------	-------------

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used

surcoat.wk4 9/95

**Company Name: Raybestos Products Company**  
**Address City IN Zip: 1204 Darlington Avenue, Crawfordsville, IN 47933**  
**MSM: 107-16568-00007**  
**SPM: 107-16919-00007**  
**Permit Reviewer: Alic Bent/EVP**  
**Date: January 8, 2003**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Phenol	Weight % MEK	Weight % Formaldehyde	Phenol Emissions (ton/yr)	MEK Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)
P013(O)									
Yarn Saturant (as applied)	7.6	0.01000	31.250	7.20%	63.50%	0.92%	0.75	6.61	0.10
MEK Viscosity Reducer	6.7	0.00130	31.250	0.00%	100.00%	0.00%	0.00	1.19	0.00
P013(P)									
Mold Release Lubricant	6.5	0.00400	31.250	0.00%	0.00%	0.00%	0.00	0.00	0.00

Total Potential Emissions
 
**0.75**
**7.80**
**0.10**

### METHODOLOGY

$\text{HAPS emission rate (tons/yr)} = \text{Density (lb/gal)} * \text{Gal of Material (gal/unit)} * \text{Maximum (unit/hr)} * \text{Weight \% HAP} * 8760 \text{ hrs/yr} * 1 \text{ ton/2000 lbs}$